UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, Administrator, et al., :
Plaintiffs, :
:
vs. : C.A. No. 04-312L
:
JEFFREY DERDERIAN, et al., :
Defendants :

PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME WITHIN WHICH TO PROVIDE INITIAL RESPONSES TO DEFENDANTS' INITIAL MOTIONS FOR SUMMARY JUDGMENT

The *Gray* Plaintiffs[1] respectfully move this Court for an Order extending the time period contained within Paragraph 4 of the Interim Scheduling Order to June 13, 2007 for Plaintiffs to "identify, pursuant to F.R.Civ.P. 56(e) and (f), the material facts they believe to be at issue and the discovery requested to object to" the Initial Summary Judgment Motions presently pending before this Court.

In support of this Motion, Plaintiffs note that Defendants have filed twenty-vive (25) Initial Motions for Summary Judgment in this matter. These Motions and supporting documentation comprise approximately 4500 pages of material that Plaintiffs must review and respond to. Moreover, the majority of these Motions were filed on the same day, which creates a substantial burden for Plaintiffs in properly preparing responses within the thirty day period presently required by the Interim Scheduling Order. A similar Motion was filed by the *Gray* and *Napolitano* Plaintiffs.

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[1]All Plaintiffs in Guindon, et al. vs. American Foam, et al. C.A. No. 03-335-L (Adopting the Third Amended Complaint in C.A. No. 04-312L); All Plaintiffs in Roderiques, et al. vs. American Foam, et al. C.A. 04-26-L (Adopting the Third Amended Complaint in C.A. No. 04-312L); All Plaintiffs in Sweet, et al. vs. American Foam, et al. C.A. 04-56-L (Adopting the Third Amended Complaint in C.A. No. 04-312L)

Plaintiffs respectfully request expedited consideration of this Motion.

Plaintiffs[1]
By Their Attorneys,
BRIAN CUNHA & ASSOCIATES

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CERTIFICATION OF SERVICE

I hereby certify that on the 20th day of April, 2007 a true copy of the within was served electronically pursuant to the Court's Order to the following;

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